

Patrick, Steven (Tyson 30b6) 8/21/2007 2:44:00 PM

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1 IN THE UNITED STATES DISTRICT COURT FOR THE  
2 NORTHERN DISTRICT OF OKLAHOMA

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W. A. DREW EDMONDSON, in his )  
5 capacity as ATTORNEY GENERAL )  
OF THE STATE OF OKLAHOMA and )  
6 OKLAHOMA SECRETARY OF THE )  
ENVIRONMENT C. MILES TOLBERT,) )  
7 in his capacity as the )  
TRUSTEE FOR NATURAL RESOURCES)  
8 FOR THE STATE OF OKLAHOMA, )

)  
9 Plaintiff, )

)

10 vs. )4:05-CV-00329-TCK-SAJ

)

11 TYSON FOODS, INC., et al, )

)

12 Defendants. )

13 -----

14 THE VIDEOTAPED 30(b)(6)  
15 DEPOSITION OF STEVEN PATRICK, produced as a  
16 witness on behalf of the Plaintiff in the above  
17 styled and numbered cause, taken on the 21st day of  
18 August, 2007, in the City of Fayetteville, County of  
19 Washington, State of Arkansas, before me, Lisa A.  
20 Steinmeyer, a Certified Shorthand Reporter, duly  
21 certified under and by virtue of the laws of the  
22 State of Oklahoma.

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1 transporting more than 200,000 tons of litter to  
 2 areas, other areas for the next three years?  
 3 A Yes, and I've been working on that issue.  
 4 Q How would removing 200,000 tons of litter to  
 5 areas outside the watershed improve the watershed? 03:16PM  
 6 MR. McDANIEL: Object as misleading.  
 7 A I would say the way I would answer this is  
 8 that what we believe from Tyson's perspective, and I  
 9 don't want to speculate what the others, but over a  
 10 period of time it has become more difficult on 03:16PM  
 11 growing chickens and the transportation issue and  
 12 fuel, fuel costs. What we have committed to is  
 13 putting up a program and working through BMP, Inc.,  
 14 to move 200,000 tons of litter so that we would be a  
 15 service to those locations, and what I mean by that 03:16PM  
 16 is they are -- I look at it as they are sellers. We  
 17 would look to find haulers and we would try to  
 18 search for buyers who are interested in getting  
 19 poultry litter, and what we have committed to is  
 20 somebody needs to take the initiative if they want 03:17PM  
 21 that to move forward. So these integrators all  
 22 together said we will put up the money to see if we  
 23 can get the people who are interested in selling  
 24 litter to other areas, that are interested in that  
 25 process we want to work with them because there's a 03:17PM

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1 perception that they could do something, and as  
 2 people buy more farms or as other land becomes more  
 3 available and becomes -- not necessarily urban but  
 4 they have less land available to them potentially,  
 5 they would want to ship more out of the watershed. 03:17PM  
 6 So we went in, and that's when -- the information  
 7 you had earlier about whether the costs, we put in  
 8 money to -- through BMP, Inc., to get funding to  
 9 move this 200,000 tons, and we have been actively  
 10 doing that for the past two years, and we have moved 03:17PM  
 11 a tremendous amount of litter out of the watershed  
 12 in order to meet that commitment, to honor our word.  
 13 That's what we did.  
 14 Q I believe I heard in all that you said to be  
 15 of service to those people? 03:18PM  
 16 A To the contract growers and to those in  
 17 Oklahoma who are interested and Arkansas of  
 18 obtaining litter that have never used it before.  
 19 Q My question still is, how will moving 200,000  
 20 tons of litter out of the scenic river watersheds 03:18PM  
 21 help those watersheds, not help those people who  
 22 live there or get the litter from somewhere else but  
 23 how will it help the watershed?  
 24 MS. HILL: Object to the form.  
 25 MR. GEORGE: Mischaracterizes the document 03:18PM

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1 SIGNATURE PAGE

2  
3 I, Steven Patrick, do hereby certify  
4 that the foregoing deposition was presented to me by  
5 Lisa A. Steinmeyer as a true and correct transcript  
6 of the proceedings in the above styled and numbered  
7 cause, and I now sign the same as true and correct.

8 WITNESS my hand this \_\_\_\_\_ day of  
9 \_\_\_\_\_, 2007.

10  
11  
12 \_\_\_\_\_  
STEVEN PATRICK

13  
14  
15  
16  
17 SUBSCRIBED AND SWORN TO before me this  
18 \_\_\_\_\_ day of \_\_\_\_\_, 2007.

19  
20  
21 \_\_\_\_\_  
Notary Public

22  
23 My Commission Expires:  
24 \_\_\_\_\_  
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1 C E R T I F I C A T E

2  
3 STATE OF OKLAHOMA )  
4 ) ss.  
COUNTY OF TULSA )

5  
6 I, Lisa A. Steinmeyer, Certified  
7 Shorthand Reporter within and for Tulsa County,  
8 State of Oklahoma, do hereby certify that the above  
9 named witness was by me first duly sworn to testify  
10 the truth, the whole truth and nothing but the truth  
11 in the case aforesaid, and that I reported in  
12 stenograph his deposition; that my stenograph notes  
13 were thereafter transcribed and reduced to  
14 typewritten form under my supervision, as the same  
15 appears herein.

16 I further certify that the foregoing 289  
17 pages contain a full, true and correct transcript of  
18 the deposition taken at such time and place.

19 I further certify that I am not attorney  
20 for or relative to either of said parties, or  
21 otherwise interested in the event of said action.

22 WITNESS MY HAND AND SEAL this 9th day of  
23 September, 2007.

24 \_\_\_\_\_  
LISA A. STEINMEYER, CRR  
25 CSR No. 386